

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

LANDWORKS CREATIONS, LLC.) C.A. NO.05-CV-40072 FDS
)
Plaintiff)
)
v.)
)
UNITED STATES FIDELITY AND GUARANTY)
COMPANY and)
LOVETT-SILVERMAN CONSTRUCTION)
CONSULTANTS, INC.)
)
Defendants)
)

PLAINTIFF LANDWORKS, LLC.'S SUPPLEMENTAL EXPERT DISCLOSURE
PURSUANT TO F.R.C.P. 26(a)(2)

Now comes the Plaintiff, Landworks Creations, LLC, and subject to the Court's Order to disclose its experts financial arrangement more completely and "forthwith" does hereby supplement and discloses its expert pursuant to F.R.C.P. 26(a)(2)(A) and F.R.C.P. 26(a)(2)(B). The Plaintiff will call William Gallagher, of One Homestead Drive in Medway as its expert witness.

Mr. Gallagher has previously provided a ten page affidavit which was appended to the Plaintiff's Opposition to Defendant, Lovett-Silverman's Motion for Summary Judgment. The affidavit is his written report and was signed by him. This affidavit, which included Mr. Gallagher's curriculum vitae, provided his background and areas of expertise, the documents and materials which he reviewed and relied upon in preparing his expert opinions, the identity of witnesses interviewed and his expert opinions derived from his investigation. As is noted

on the curriculum vitae, Mr. Gallagher has published no articles, and has not testified as an expert witness before.

His fee for producing his report was \$125/hr. At this juncture, he has not requested compensation for producing his report or for his anticipated testimony at trial, and Landworks has made no payments to Mr. Gallagher. Mr. Gallagher has no agreement that will make payment for his services contingent on the outcome of this case

Mr. Gallagher was also identified and disclosed in the final supplemental answers of the Plaintiff to interrogatories, which was served on all parties on April 7, 2007.

Respectfully Submitted,
Landworks Creations, LLC
By its attorney,

s/Robert N. Meltzer
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Dated: May 12, 2008